



Annual Performance Report Form

Facility Name: Aaron Oil Company, Inc.

Performance Track ID #: A040024

Annual Performance Report #: 1

Reporting Year: 2001

Due Date: April 1, 2002

Section A

General Facility Information

To the extent possible, EPA will pre-complete items A.1-A.8 for you. Please ensure that the information in A.1-A.8 below is accurate, complete, and up to date. Please supply or revise any information as necessary and then check the box to the left of the item(s) to indicate where changes have been made. Items A.9 and A.10 cannot be pre-completed; please respond as directed in A.9 and A.10 below.

Did you make changes? If so, check box.

- A.1 ☐ Name of your facility: Aaron Oil Company, Inc.
- A.2 ☐ Name of your parent company: Same
- A.3 ☐ Facility contact person for the Performance Track program
Name: Mr./Mrs./Ms./Dr. Lynn Clemmons
Title: Compliance Officer
Phone: 251-675-4666 Ext 226 Fax: 251-679-8783 E-mail: LynnC@aaronoil.com
- A.4 ☐ Facility's location
Street Address: 713 Bill Myles Dr.
Street Address (cont.):
City/State/Zip Code: Saraland, AL 36571
- A.5 ☐ Facility's website address (if any): www.aaronoil.com
- A.6 ☐ Number of employees (full-time equivalents) who currently work in the facility:
☐ Fewer than 50 ☒ 50 - 99 ☐ 100 - 499 ☐ 500 - 1000 ☐ More than 1000
- A.7 ☐ Does your company meet the Small Business Administration definition of a small business for your sector? ☒ Yes ☐ No
- A.8 ☐ North American Industrial Classification System (NAICS) Code(s) that are used to classify business at the facility: 421930 _____
- A.9 ☐ In your application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any (additional) changes to your facility's list of products and/or activities? If so, please list them in the space below. ☐ Yes ☒ No
- A.10 ☐ Please update the list of environmental requirements that apply to your facility. In the space below, indicate any changes that have taken place during this reporting period. If you have no changes to report, please write "No changes."
No Changes

Section B

Environmental Management System

B.1 Environmental Management System Assessment. Please summarize EMS assessments conducted *during the year*. Attach additional sheets as necessary.

a. Was an EMS audit or other assessment done by an independent third party?

☒ Yes ☐ No

If yes, please provide the *type* (e.g., ISO 14001 certification), the *scope*, and the *dates* (mo/yr) of each assessment.

An annual ISO 1400 EMS Surveillance Service Audit was performed December 4-5, 2001 to determine Aaron Oil Company's eligibility for continued ISO 14001 registration. The auditor specifically reviewed our environmental aspects, objectives and targets, environmental management programs, structure and responsibility, training, communication, EMS documentation, document control, operational control, emergency preparedness and response, monitoring and measurement, corrective and preventive actions, records and internal audits. Nonconformances were not identified during the audit and Aaron Oil was recommended for continued ISO 14001 registration.

b. Was an internal or corporate EMS audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit.

Internal EMS audits are conducted quarterly by the company Compliance Officer. Report due dates are: March 31st, June 30th, September 30th, and December 31st. The audit reviews all the elements of our EMS each quarter. Reports are reviewed by the company President.

c. Was a compliance audit conducted? ☒ Yes ☐ No

If yes, please provide the *scope* and the *dates* (mo/yr) of each audit, and indicate *who* conducted the audit(s) (e.g., facility staff, corporate groups, third party).

Compliance audits are performed monthly by departmental managers and the Compliance Officer. These audits cover EMS, health, safety and DOT compliance issues.

d. (Optional) If you would like to describe any other audits or inspections that were conducted at your facility, please do so here.

Section B

(continued)

B.1

e. Briefly summarize corrective actions taken and other improvements made as a result of your EMS assessments and compliance audits.

Updates are periodically made to our EMS as the company changes and expands. For example, as new positions are added, the EMS is updated to include the EMS roles and responsibilities assigned to each new position.

f. Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

☒ Yes ☐ No ☐ No such instances identified

If no, please explain your plans to correct these instances.

g. When was the last Senior Management review of your EMS completed? *mo/yr* November 2001

Who headed the review?

Name: Mr./Mrs./Ms./Dr. Mr. Daniel A. Cowart

Title: President and C.E.O.

Section B

(continued)

B.2 ISO 14001 Certification. Is your facility currently certified to ISO 14001? ☒ Yes ☐ No

B.3 Environmental Aspects Identification. When did your facility last conduct a systematic identification and/or review of your environmental aspects? *mo/yr* November 2001

B.4 Progress Toward Achieving Objectives and Targets. In the table below, please provide a narrative summary of progress made toward EMS objectives and targets. **You may limit the summary to environmental aspects that are *significant* and towards which *progress* has been made during the *reporting year*.** In cases where progress relates specifically to a Performance Track performance commitment, complete the *Environmental Aspect* column, but in the *Progress* column simply refer to the performance commitment tables in Section C, i.e. "See Section C." Attach additional sheets as necessary.

<i>Environmental Aspect</i>	<i>Progress Made This Year</i> (e.g., quantitative or qualitative improvements, activities conducted)
Recycled /Reused Materials	Increased volume of fuel filters recycled. Exceeded fuel filter recovery and recycling goal.
BOD Discharges to Water	See Section C
Emission of VOCs	See Section C
Recycled/Reused Materials	Exceeded used oil recycling target for newest transfer facility by 51%.

Section C

Environmental Performance Commitments

Please use the tables on pages 6-9 to summarize your facility's environmental performance against your Performance Track performance commitments. Complete only those boxes related to the baseline, current year, and performance commitment. If any of the boxes have been pre-completed for you, please verify the information. If you find information that is incorrect, cross it out and write in the correct information. **Leave blank any columns for future reporting years.**

C.1

Performance Commitment 1

a. Use this table to report data related to your first performance commitment.

Category (see page 16 of the instructions): Discharges to Water

Aspect (see page 16 of the instructions): BOD Discharges to water

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	487,645	304,279			(optional)
<i>Measurement Units</i>	lbs/year				
<i>Normalizing Factor*</i>	1.0	.88			(optional)
<i>Basis for your Normalizing Factor*</i>	gallons of wastewater processed				
<i>Normalized Quantity* (per year)</i>	487,645	345,772			1000lb/day

*See pages 17-19 of the instructions for more information

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

This improvement was achieved through careful management of our wastewater process. Incoming water streams were analyzed and excessively high BOD streams were eliminated. Process water coming from our used oil processing and recycling was identified as one of our highest sources of BOD. During third quarter of 2001, a new used oil and petroleum reclamation process was implemented which will result in lower BOD process water being removed from the petroleum products due to better separation of the oil, light ends and water, thereby further reducing BOD levels.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.2

Performance Commitment 2

a. Use this table to report data related to your second performance commitment.

Category (see page 16 of the instructions): Air Emissions					
Aspect (see page 16 of the instructions): Emission of VOCs					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>	2000	2001			2003
<i>Actual Quantity (per year)</i>	.49	.45			(optional)
<i>Measurement Units</i>	lbs/hr				
<i>Normalizing Factor*</i>	1.0	.88			(optional)
<i>Basis for your Normalizing Factor*</i>	gallons of wastewater processed				
<i>Normalized Quantity* (per year)</i>	.49	.51			0
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

Our original goal was based on a new wastewater treatment process being implemented. The new treatment process did not have the expected results. This wastewater treatment process was new technology not previously tried in our industry. Unfortunately, after much research and development, the process was unable to attain the expected results. While we did not have the expected reduction in VOC's from the wastewater modification, we are continuing to make process improvements to lower these emissions. A substantial investment has been made in a new used oil and petroleum reclamation process. This new equipment should enable Aaron Oil Company, Inc. to tie in the vent lines of process tanks to capture VOC emissions from storage and process tanks.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.3

Performance Commitment 3

a. Use this table to report data related to your third performance commitment.

Category (see page 16 of the instructions):					
Aspect (see page 16 of the instructions):					
	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>		2001			2003
<i>Actual Quantity (per year)</i>					(optional)
<i>Measurement Units</i>					
<i>Normalizing Factor*</i>	1.0				(optional)
<i>Basis for your Normalizing Factor*</i>					
<i>Normalized Quantity* (per year)</i>					
*See pages 17-19 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section C

(continued)

C.4

Performance Commitment 4

a. Use this table to report data related to your fourth performance commitment.

Category (see page 16 of the instructions):

Aspect (see page 16 of the instructions):

	<i>Baseline (as stated in your application)</i>	<i>Year 1</i>	<i>Year 2</i>	<i>Year 3</i>	<i>Performance Commitment (the goal stated in your application)</i>
<i>Calendar Year</i>		2001			2003
<i>Actual Quantity (per year)</i>					(optional)
<i>Measurement Units</i>					
<i>Normalizing Factor*</i>	1.0				(optional)
<i>Basis for your Normalizing Factor*</i>					
<i>Normalized Quantity* (per year)</i>					
*See pages 15-17 of the instructions for more information					

b. Briefly describe how you achieved improvements for this aspect or, if relevant, any circumstances that delayed progress.

c. Please list any other EPA voluntary programs to which you are also reporting these data (e.g., Energy Star, Project XL).

Section D

Public Outreach and Performance Reporting

D.1 Please briefly summarize the public outreach and reporting activities that your facility has conducted during the year. Feel free, but not obligated, to attach supporting materials (e.g., meeting agendas, public announcements).

Aaron Oil Company, Inc.'s Compliance Officer gave a presentation at an EMS Workshop held in Mobile, Alabama on June 20-21st, 2001, that was sponsored by the Alabama Department of Environmental Management and EPA Region IV. The meeting was intended to provide information to local companies on how to implement an Environmental Management System. Aaron Oil Company, Inc.'s Compliance Officer spoke on how the company went about establishing their EMS, lessons learned and benefits reaped.

D.2 Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check as many as are appropriate.

☒ Website (URL www.aaronoil.com)

☐ Open House

☐ Meetings

☐ Press Releases

☐ Community Advisory Panel

☐ Other

Section E

Self-Certification of Continued Program Participation

On behalf of Aaron Oil Company, Inc.,
(name of my facility)

I certify that

- ◆ I have read and agree to the terms and conditions specified in *the National Environmental Performance Track Program Guide*. This facility, to the best of my knowledge, continues to meet all program criteria;
- ◆ I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- ◆ My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- ◆ My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- ◆ Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date _____

Printed Name Mr./Mrs./Ms./Dr. Mr. Daniel A Cowart

Title President and C.E.O.

Phone Number/E-mail Address 251-479-1616 DanC@aaronoil.com

Facility Name Aaron Oil Company, Inc.

Facility Street Address 713 Bill Myles Dr., Saraland, AL 36571

Performance Track Identification Number A040024

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 188 hours per respondent annually. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.